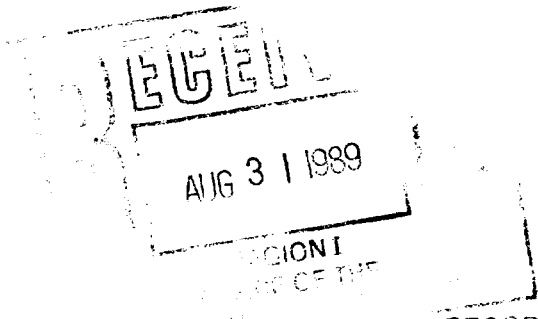


HEA

Date: 8-22-89

Regional Administrator
US Environmental Protection Agency
JFK Federal Building
Boston, MA 02203



RCRA RECORDS CENTER
FACILITY Praff Whitney
ID. NO. CTD990672081
FILE LOC. R 118
OTHER RDMS #2330

Re: Soft Hammer Demonstration and Certification for

Name: Praff Whitney EPA ID No.: CTD990672081

Address: 400 MAIN ST
E. HARTFORD, CT 06108 Phone No.: (203) 565-0338

Dear Sir:

The Land Disposal Restrictions (40 CFR Part 268) prohibit the land disposal of listed hazardous wastes which do not meet treatment standards specified by the US EPA. 40 CFR 268.8(a) requires generators of "soft-hammer" wastes (First- and Second-Third wastes for which no treatment standard has yet been established) to:

- (1) Make a good faith effort to locate and contract with treatment and recovery facilities which use the practically-available technology which yields the greatest environmental benefit, and
- (2) Submit appropriate documentation of that effort to the EPA Regional Administrator.

This letter is intended to serve as a soft-hammer demonstration and certification for the following waste streams:

| <u>EPA Waste Code & Description</u> | <u>EPA Waste Code & Description</u> | <u>EPA Waste Code & Description</u> |
|---|---|---|
| <u>U154-METHANOL</u> | | |
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| | | |
| | | |

SEPT 06 89

All of the soft-hammer waste streams noted above are "U" or "P" code hazardous wastes which, by definition, are commercial chemical products intended to be discarded. These wastes were generated as the result of a laboratory cleanout operation conducted on our behalf by Clean Harbors of Natick, Inc. None of the wastes included above are spent solvent (F001-F005) or dioxin (F020-F028) wastes.

Clean Harbors of Natick, Inc. has contacted the following hazardous waste treatment and recovery facilities on our behalf and, based on those inquiries, determined that incineration is the best practically-available treatment method for above-described waste streams. In no case will any of the above-listed wastes (or residues) be disposed or treated in a land disposal unit in excess of the California List prohibition levels.

1. Clean Harbors of Braintree, Inc.
385 Quincy Avenue
Braintree, MA 02184 (617) 849-1807
Contact: Doug Lanich (7/14/89): "All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material."
2. Trade Waste Incineration
7 Mobile Avenue
Sauget, IL 62201 (618) 271-2804
Contact: Dennis Marchol (7/14/89): "Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration"
3. ENSCO, Inc.
American Oil Road
El Dorado, AR 71730 (501) 223-4160
Contact: Eva Dodd (7/14/89): "All material is incinerated on site. Incineration is the best-available technology for the destruction of organic material."
4. ThermalKEN
454 S. Anderson Road
Rock Hill, SC 29730 (803) 329-9690
Contact: Nickie Humphries (7/14/89): All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material."
5. Tricil, Ltd.
1829 Allansport Road
Thorold, Ont., CANADA (416) 227-7872
Contact: Gregg Renneigas (7/14/89): "Material is blended for incineration offsite. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material."
6. CUN/SCA Chemical Services
11700 S. Stoney Island Avenue
Chicago, IL 60617 (312) 646-5700
Contact: Bruce Marti (7/14/89): "The soft-hammer waste that is accepted at this facility is incinerated which is the best-available treatment technology for the destruction of organic material and residues."

Certification

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Lawrence Lucia
Name (Print)

Supervisor
Title

Lawrence Lucia
Signature

(IF APPLICABLE)

This soft-hammer demonstration/certification replaces previous notice(s) submitted to EPA on the following date(s):

Date: 8/23/89

Regional Administrator
US Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

RECEIVED
AUG 31 1989

REGION I

Re: Soft Hammer Demonstration and Certification for

Name: PRATT Whitney EPA ID No.: CT0990672081

Address: 400 MAIN ST

S. HARTFORD, CT 06108 Phone No. (203) 565-8803 0338

Dear Sir:

The Land Disposal Restrictions (40 CFR Part 268) prohibit the land disposal of listed hazardous wastes which do not meet treatment standards specified by the US EPA. 40 CFR 268.8(a) requires generators of "soft-hammer" wastes (First- and Second-Third wastes for which no treatment standard has yet been established) to:

- (1) Make a good faith effort to locate and contract with treatment and recovery facilities which use the practically-available technology which yields the greatest environmental benefit, and
- (2) Submit appropriate documentation of that effort to the EPA Regional Administrator.

This letter is intended to serve as a soft-hammer demonstration and certification for the following waste streams:

| <u>EPA Waste Code & Description</u> | <u>EPA Waste Code & Description</u> | <u>EPA Waste Code & Description</u> |
|---|---|---|
| <u>U002 - Acetone</u> | | |
| <u>U122 - Formaldehyde</u> | | |
| <u>U159 - methyl ethyl ketone</u> | | |
| <u>U088 - Phenol</u> | | |
| <u>U196 - pyridine</u> | | |
| <u>U220 - toluene</u> | | |
| <u>U239 - xylene</u> | | |

All of the soft-hammer waste streams noted above are "U" or "P" code hazardous wastes which, by definition, are commercial chemical products intended to be discarded. These wastes were generated as the result of a laboratory cleanout operation conducted on our behalf by Clean Harbors of Natick, Inc. None of the wastes included above are spent solvent (F001-F005) or dioxin (F020-F028) wastes.

Clean Harbors of Natick, Inc. has contacted the following hazardous waste treatment and recovery facilities on our behalf and, based on those inquiries, determined that incineration is the best practically-available treatment method for above-described waste streams. In no case will any of the above-listed wastes (or residues) be disposed or treated in a land disposal unit in excess of the California List prohibition levels.

1. Clean Harbors of Braintree, Inc.
385 Quincy Avenue
Braintree, MA 02184 (617) 849-1807
Contact: Doug Lanich (7/14/89): "All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material."

2. Trade Waste Incineration
7 Mobile Avenue
Sauget, IL 62201 (618) 271-2804
Contact: Dennis Warchol (7/14/89):
"Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration"

3. ENSCO, Inc.
American Oil Road
El Dorado, AR 71730 (501) 223-4160
Contact: Eva Dodd (7/14/89): "All material is incinerated on site. Incineration is the best-available technology for the destruction of organic material."

4. ThermalKEN
454 S. Anderson Road
Rock Hill, SC 29730 (803) 329-9690
Contact: Nickie Humphries (7/14/89):
All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material."

5. Tricil, Ltd.
1829 Allansport Road
Thorold, Ont., CANADA (416) 227-7872
Contact: Gregg Remmelgas (7/14/89):
"Material is blended for incineration offsite. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material."

6. CWH/SCA Chemical Services
11700 S. Stoney Island Avenue
Chicago, IL 60617 (312) 646-5700
Contact: Bruce Marti (7/14/89): "The soft-hammer waste that is accepted at this facility is incinerated which is the best-available treatment technology for the destruction of organic material and residues."

Certification

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Lawrence Lucia
Name (Print)

Supervisor
Title

Lawrence Lucia
Signature

(IF APPLICABLE)

This soft-hammer demonstration/certification replaces previous notice(s) submitted to EPA on the following date(s):

Clean Harbors

RECEIVED

OCT 02 89

Date: 5/22/89

To: Micheal Deland
Regional Administrator
USEPA
JFK Federal Building
Boston, MA 02203

RE: Soft Hammer Demonstration/Certification

In accordance with the EPA's Land disposal restrictions governing the first third scheduled wastes,

Pratt-Winter 415 Washington Ave Northvale Ct. 06473 has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a) for the waste stream described by the USEPA Waste Codes circled below.

F006 F007 F008 F009 F019 K004 K008 K011 K013 K014 K017 K021 K022 K025 K031 K035 K036 K046 K060 K061 K069 K073
K083 K084 K085 K086 K101 K102 K106 P001 P004 P005 P010 P011 P012 P015 P016 P018 P020 P030 P036 P037 P039 P041
P048 P050 P058 P059 P063 P068 P069 P070 P071 P081 P082 P084 P087 P089 P092 P094 P097 P102 P105 P108 P110 P115
P120 P122 P123 U007 U009 U010 U012 U016 U018 U019 U022 U029 U031 U036 U037 U041 U043 U044 U046 U050 U051 U053
U061 U063 U064 U066 U067 U074 U077 U078 U086 U089 U103 U105 U108 U115 U122 U124 U129 U130 U133 U134 U137 U151
U154 U155 U157 U158 U159 U171 U177 U180 U185 U188 U192 U200 U209 U210 U211 U219 U220 U221 U223 U226 U227 U228
U237 U238 U248 U249

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Jaqueline S. Brown
Authorized Signature

Through discussion with Clean Harbors, and in accordance with 40 CFR 268.8 (a) (1), I have developed this demonstration which is applicable to the waste codes circled above.

Facilities Contacted:

Trade Waste Incineration
7 Mobile Ave.
Sauget, IL 62201
(618) 271-2804

Dennis Warchol - 5/8/89
Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration.

ENSCO, Inc.
American Oil Road
El Dorado, AR 71730
(501) 223-4160
Eva Dodd - 5/5/89

All material is incinerated on site. Incineration is the best available technology for the destruction of organic material.

Clean Harbors of Braintree, Inc.
385 Quincy Avenue
Braintree, MA 02184
(617) 849-1807

Doug Lanich - 5/8/89
All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material.

Thermalken
454 S. Anderson Road BTC 532
Rock Hill, SC 29730
(803) 329-9690

Nickie Humphreys - 5/5/89
All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material.

Tricil, LTD.
1829 Allansport Road
Thorold, Ont. Canada L2V 3Y9
(416) 227-7872

Gregg Remmelgas - 5/5/89
Material is blended for incineration off site. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material.

CWM/SCA Chemical Services
11700 S. Stony Island Avenue
Chicago, IL 60617
(312) 646-5700

Bruce Marti - 5/8/89
The soft-hammer waste that is accepted at this facility is incinerated which is the best available treatment technology for the destruction of organic material and residues.

JOHN G. WHITEHEAD - Plant Manager

PRATT & WHITNEY

400 MAIN ST

EAST HARTFORD CT 06108

EP# ID# CTD 990672081

JULY 5, 1989, 12/13/88

5/22/89

SOL - U210, U226, U228

, U159

HOC(g) U210, U226, U228

- - -

5/23/89

10/14/88

7/6/89

2/3 - F009

F008

F009 (F009)

MET - U151 (5/22/89)